

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTHERN DIVISION**

Kathleen Bliss, on behalf of herself, the
Proposed Nationwide Rule 23 Class, and the
Proposed Nevada Subclass,

Plaintiff,

v.

CoreCivic, Inc.,

Defendant.

Case No. 2:18-CV-01280-JAD-EJY

**STIPULATION TO EXTEND
DEADLINES
(Third Request)**

The parties respectfully request that the Court adopt the modifications to the scheduling order set forth below with respect to Defendant's class certification expert disclosures and both parties' class certification briefing:

1. Deadline for Defendant's class certification expert disclosures extended from October 14, 2022, until February 17, 2023.

2. Class certification briefing schedule modified as proposed in the table below:

Filing	Current Deadline	Proposed Deadline
Plaintiff's opening class certification brief	December 19, 2022	March 31, 2023
Defendant's class certification response brief	January 2, 2023 (14 days after the opening brief is filed)	May 1, 2023 (30 days after the opening brief is filed)
Plaintiff's class certification reply brief	January 9, 2023 (7 days after the response brief is filed)	May 31, 2023 (30 days after the response brief is filed)

This is the third request to extend time to file Defendant's class certification expert disclosures and the parties' class certification briefs. (See ECF Nos. 86 and 155 (the parties' previous requests).) The existing schedule has been in place since October 4, 2021. (ECF No. 156.) Since that time, the parties made significant progress on discovery necessary for class certification

and reached a stipulation regarding Defendant's use of certain non-ESI documents to argue against class certification. (ECF No. 215.) Accordingly, the primary outstanding discovery that is relevant to class certification is from third-party telephone vendors and state bar associations, and from recently disclosed witnesses. The parties make this request because of issues that have arisen with the aforementioned third-party discovery (including issues related to data production and deposition scheduling conflicts), Plaintiff's desire to take depositions of certain of Defendant's recently disclosed witnesses, and ongoing work through the agreed upon ESI protocol.

Date: October 14, 2022

NICHOLS KASTER, PLLP

s/ Charles J. O'Meara

Matthew H. Morgan* MN Bar No. 304657
 Anna P. Prakash* MN Bar No. 0351362
 Charles A. Delbridge* MN Bar No. 0386639
 Rebekah L. Bailey* MN Bar No. 0389599
 Charles J. O'Meara* MN Bar No. 0402777
 NICHOLS KASTER, PLLP
 4700 IDS Center
 80 South 8th Street
 Minneapolis, MN 55402
 Tel: 612.256.3200
 morgan@nka.com
 aprakash@nka.com
 cdelbridge@nka.com
 bailey@nka.com
 comeara@nka.com

NICHOLS KASTER, LLP

Matthew C. Helland* CA Bar No. 250451
 235 Montgomery St., Suite 810
 San Francisco, CA 94104
 Telephone: (415) 277-7235
 helland@nka.com

Michael Hodgson* MO Bar No. 63677
 THE HODGSON LAW FIRM, LLC
 3609 SW Pryor Road
 Lee's Summit, MO 64082
 Tel: 816.600.0117
 mike@thehodgsonlawfirm.com

Lance D. Sandage* MO Bar No. 46022
 SANDAGE LAW LLC

STRUCK LOVE BOJANOWSKI &
 ACEDO, PLC

s/ Anne. M. Orcutt

Daniel P. Struck
 Rachel Love
 Jacob B. Lee
 Ashlee B. Hesman
 Anne M. Orcutt
 Eden G. Cohen
 3100 West Ray Road, Suite 300
 Chandler, AZ 85226
 dstruck@strucklove.com
 rlove@strucklove.com
 jlee@strucklove.com
 ahesman@strucklove.com
 aorcutt@strucklove.com
 ecohen@strucklove.com

Gina G. Winspear
 DENNETT WINSPEAR
 3301 North Buffalo Dr., Suite 195
 Las Vegas, NV 89129
 gwinspear@dennettwinspear.com

Attorneys for Defendant CoreCivic, Inc

1 1600 Genessee Street, Suite 655
2 Kansas City, MO 64102
3 Tel: 816.753.0800
4 lance@sandagelaw.com

5 Joseph K. Eischens* MO Bar No. 44706
6 LAW OFFICE OF JOSEPH K. EISCHENS
7 8013 Park Ridge Dr.
8 Parkville, MO 64152
9 Tel: 816.945.6393
10 joe@jkemediation.com

11 Paul S. Padda
12 NV Bar No. 10417
13 PAUL PADDA LAW, PLLC
14 4560 South Decatur Blvd., Suite 300
15 Las Vegas, NV 89103
16 Tel: 702.366.1888
17 psp@paulpaddalaw.com

18 *Admitted pro hac vice

19 Attorneys for Plaintiff and the Proposed
20 Classes

21 **IT IS SO ORDERED:**

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: October 17, 2022